

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CAREY MARTIN,)	
)	
Plaintiff,)	
)	Case No. 10 C 2611
v.)	
)	Judge Wayne R. Andersen
MIDLAND CREDIT MANAGEMENT, INC.,)	
)	Magistrate Judge Maria Valdez
Defendant.)	
)	

UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

NOW COMES Defendant Midland Credit Management, Inc. (“MCM”), and for its motion for extension of time to respond to the complaint, states as follows:

1. MCM’s registered agent was served with the Complaint on June 17, 2010.
2. On July 8, 2010, MCM filed an unopposed motion to extend time to answer until August 9, 2010, in order to review the materials and investigate the claims asserted so that it could file an appropriate responsive pleading to the Complaint.
3. Shortly thereafter, the parties conducted a scheduling conference and submitted a proposed schedule to Magistrate Judge Valdez, who has been referred this matter for purposes of overseeing discovery. Since that time, the parties have been engaged in a dialogue regarding the merits of Plaintiffs’ claims and preliminarily discussing the possibility of settlement. While the parties explore settlement, in the interests of judicial economy and to avoid wasting the resources of the parties in briefing a motion to dismiss while exploring settlement, Defendant requests an extension of thirty days, up to and including September 8, 2010, within which to file its responsive pleading to the Complaint.

4. The undersigned counsel has consulted with counsel for Plaintiff, and Plaintiff has no objection to MCM's request for a thirty-day extension.

WHEREFORE, MCM respectfully requests that this Honorable Court grant an extension of time, up to and including September 8, 2010, for MCM to file its responsive pleading.

Dated: August 9, 2010

Respectfully Submitted,

MIDLAND CREDIT MANAGEMENT,
INC., MIDLAND FUNDING, LLC, and
ENCORE CAPITAL GROUP, INC.

By: /s/ Tammy L. Adkins
One of Their Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2010, I filed the foregoing with the Clerk of the Court using the CM/ECF system, which constitutes service on below counsel, registered electronic filing users, pursuant to Fed. R. Civ. P. 5(b)(2)(D) and L.R. 5.9:

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